



Warren T. Burns  
wburns@burnscharest.com

August 17, 2015

Hon. Esther Salas  
United States District Court for the District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07101

Re: *In re Vehicle Carrier Services Antitrust Litigation*, Master Docket No. 13-3306 (MDL No. 2471)

Dear Judge Salas:

We write on behalf of the End-Payor Plaintiffs, Automobile Dealer Plaintiffs, Truck and Equipment Dealer Plaintiffs (collectively, "Indirect Purchaser Plaintiffs"), and Defendants Mitsui O.S.K. Lines, Ltd., Mitsui O.S.K. Bulk Shipping (USA), Inc., World Logistics Services USA, Inc., Nissan Motor Car Carrier Co. Ltd. (collectively, "M.O.L.").

The parties are pleased to advise the Court that they have reached a settlement agreement. The settlement agreement will resolve all claims brought by Indirect Purchaser Plaintiffs against M.O.L. The parties have memorialized their agreement in a Memorandum of Understanding. The Memorandum is subject only to M.O.L. Board of Directors' approval, which the parties anticipate will occur on September 30, 2015. Accordingly, the parties request that the Court stay all proceedings as they relate to M.O.L.

At this time, the parties have agreed to keep the amount of the settlement payment confidential. However, the parties are willing to disclose the amount to the Court *in camera* if the Court desires.

After the parties negotiate and execute a long-form settlement agreement, the Indirect Purchaser Plaintiffs promptly will bring a motion for preliminary approval.

Best regards,

**BURNS CHAREST LLP**

A handwritten signature in blue ink, appearing to read "Warren T. Burns", is written over a horizontal line.

Warren T. Burns, Partner

Warren T. Burns  
Daniel H. Charest  
William Thompson  
**BURNS CHAREST LLP**  
500 North Akard, Suite 2810  
Dallas, Texas 75201  
Telephone: (469) 904-4550  
Facsimile: (469) 444-5002  
wburns@burnscharest.com  
dcharrest@burnscharest.com  
wthompson@burnscharest.com

Korey A. Nelson  
Elizabeth A. Roché  
**BURNS CHAREST LLP**  
365 Canal Street, Suite 1170  
New Orleans, Louisiana 70130  
Telephone: (504) 799-2845  
Facsimile: 504-881-1765  
knelson@burnscharest.com  
eroche@burnscharest.com

Hollis Salzman  
Bernard Persky  
William V. Reiss  
**ROBINS KAPLAN LLP**  
601 Lexington Avenue, Suite 3400  
New York, NY 10022  
Telephone: (212) 980-7400  
Facsimile: (212) 980-7499  
hsalzman@robinskaplan.com  
bpersky@robinskaplan.com  
wvreiss@robinskaplan.com

Joseph W. Cotchett  
Steven N. Williams  
**COTCHETT, PITRE & McCARTHY, LLP**  
San Francisco Airport Office Center  
840 Malcolm Road, Suite 200  
Burlingame, California 94010  
Telephone: (650) 697-6000  
Facsimile: (650) 697-0577  
jcotchett@cpmlegal.com  
swilliams@cpmlegal.com

***Proposed Interim Co-Lead Counsel for  
End-Payor Plaintiff***

burns charest LLP | 500 north akard street | suite 2810 | dallas, texas 75201

James E. Cecchi  
**CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.**  
5 Becker Farm Road  
Roseland, New Jersey 07068  
Telephone: (973) 994-1700  
Facsimile: (973) 994-1744  
jcecchi@carellabyrne.com

***Proposed Interim Liaison Counsel for End-  
Payor Plaintiffs***

Jonathan W. Cuneo  
Joel Davidow  
Katherine Van Dyck  
Daniel Cohen  
**CUNEO GILBERT & LADUCA, LLP**  
507 C Street NE  
Washington, D.C. 20002  
Telephone: (202) 789-3960 jcuneo@cuneolaw.com  
joel@cuneolaw.com  
kvandyck@cuneolaw.com  
danielc@cuneolaw.com

Benjamin D. Elga  
**CUNEO GILBERT & LADUCA, LLP**  
16 Court Street, Suite 1012  
Brooklyn, NY 11241  
Telephone: (202) 789-3960  
belga@cuneolaw.com

Don Barrett  
David McMullan  
Brian Herrington  
**BARRETT LAW GROUP, P.A.**  
404 Court Square  
P.O. Box 927  
Lexington, Mississippi 39095  
Telephone: (662) 834-2488  
dbarrett@barrettlawgroup.com  
bherrington@barrettlawgroup.com  
dmcmullan@barrettlawgroup.com

Shawn M. Raiter  
**LARSON • KING, LLP**  
2800 Wells Fargo Place 30 East  
Seventh Street  
St. Paul, Minnesota 55101  
Telephone: (651) 312-6500  
sraiter@larsonking.com

*Automobile Dealer Interim Co-Lead Counsel*

Peter S. Pearlman  
**COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP**  
Park 80 Plaza West One  
250 Pehle Ave., Suite 401  
Saddle Brook, NJ 07663  
Telephone: (201) 845-9600 psp@njlawfirm.com

*Automobile Dealer Liaison Counsel*

Valerie Nettles  
**LOVELACE & ASSOCIATES, P.A.**  
12870 US Hwy 98 West, Suite 200  
Miramar Beach, Florida 32250  
Telephone: (850) 837-6020  
dml@lovelacelaw.com  
alex@lovelacelaw.com

Gerard V. Mantese  
David Hansma  
Brendan Frey  
**MANTESE HONIGMAN  
ROSSMAN & WILLIAMSON, P.C.**  
1361 E. Big Beaver Road  
Troy, Michigan 48083  
gmantese@manteselaw.com  
dhansma@manteselaw.com  
bfrey@manteselaw.com

Ben F. Pierce Gore  
**PRATT & ASSOCIATES**  
1871 The Alameda, Suite 425  
San Jose, California 95126  
Telephone: (408) 369-0800  
gore@prattattorneys.com

*Additional Automobile Dealer  
Counsel*

Eric R. Breslin  
**DUANE MORRIS LLP**  
One Riverfront Plaza  
1037 Raymond Boulevard, Suite 1800  
Newark, New Jersey 07102  
Telephone: (973) 424-2063  
erbreslin@duanemorris.com

Wayne A. Mack  
J. Manly Parks  
Andrew Sperl  
**DUANE MORRIS LLP**  
30 S. 17<sup>th</sup> Street  
Philadelphia, Pennsylvania 19103  
wamack@duanemorris.com  
jmparks@duanemorris.com  
arsperl@duanemorris.com

*Truck and Equipment Dealer Plaintiff  
Counsel*